

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

WALTER EDWARD LEMM, JR., Individually
and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

NEW YORK COMMUNITY BANCORP, INC.,
THOMAS R. CANGEMI and JOHN J. PINTO,

Defendants.

Case No. 1:24-cv-00903-NRM-JRC

DALE MISKEY, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

NEW YORK COMMUNITY BANCORP, INC.,
THOMAS ROBERT CANGEMI and JOHN J.
PINTO,

Defendants.

Case No. 1:24-cv-01118-NRM-JRC

**NOTICE OF SAND HOLLOW MANAGEMENT, LLC'S MOTION FOR:
(1) CONSOLIDATION OF THE RELATED ACTIONS; (2) APPOINTMENT AS LEAD
PLAINTIFF; AND (3) APPROVAL OF LEAD COUNSEL**

PLEASE TAKE NOTICE that on a date and time as may be set by the Court, Sand Hollow Management, LLC (“Sand Hollow Management”) will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), for entry of an Order: (1) consolidating the above-captioned, related actions; (2) appointing Sand Hollow Management as Lead Plaintiff in the above-captioned actions; and (3) approving Sand Hollow Management’s selection of Faruqi & Faruqi, LLP as Lead Counsel for the Class.¹

This motion is based on the accompanying Memorandum of Law in support hereof, the Declaration of James M. Wilson, Jr. and exhibits filed therewith, the pleadings and other filings herein, and such other written and oral argument as may be permitted by the Court.

For the foregoing reasons, Sand Hollow Management respectfully requests that the Court: (1) consolidate the above-captioned, related actions; (2) appoint Sand Hollow Management as Lead Plaintiff pursuant to the PSLRA; (3) approve Faruqi & Faruqi, LLP as Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: April 8, 2024

Respectfully submitted,

FARUQI & FARUQI, LLP

By: /s/ James M. Wilson, Jr.
James M. Wilson, Jr.

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¹ Rule 5.2.3 of the Court’s Individual Practice Rules requires movants to file motions after they are fully briefed (*i.e.*, bundling). Due to the PSLRA’s lead plaintiff procedure, however, Sand Hollow Management will not know which other class members may move for appointment as Lead Plaintiff until after all the movants have filed their respective motions. Under these circumstances, Sand Hollow Management respectfully requests that the bundle requirements under Rule 5.2.3 be waived.

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Hollow Management and [Proposed] Lead Counsel
for the putative Class*